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ROY ROMER  
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Interim Executive Director

September 27, 1991

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
Region VIII  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405



RE: Final Phase I RFI/RI Workplan for OU 5, the Woman Creek  
Priority Drainage, August, 1991

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and its prime operating contractor, EG&G. Based upon our review of the document and upon DOE's response to the Division's comments to the draft version, we can not recommend approval of this workplan at this time.

This workplan has two significant problems. First, the conceptual model presented, being very simplistic, can not and has not been used to design a sampling plan that completely and comprehensively addresses the pathways that will be evaluated in the Baseline Risk Assessment. It is the Division's position that the conceptual model needs a major expansion so that the sampling plan can be designed to collect all the needed data. We recommend that DOE and EG&G use the Draft Phase I RFI/RI Workplan that has been prepared for OU 3 (Offsite Areas) as an example for the revised conceptual models.

The second major shortfall in the workplan is its inability to satisfy the minimum requirements for a Phase I investigation as outlined in sections VI and VII of the IAG. As we have stated previously (in our comments to the draft and in staff level meetings concerning this document), the Division does not feel that this document represents a complete Phase I investigation. DOE has assumed that a Phase II investigation will be necessary and has delayed sampling and characterization that can and should be done in Phase I.

Again, we recognize that some IHSSs within this OU, particularly the Old Landfill, are very complex. However, using a staged

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approach within the Phase I RFI/RI investigation would not only allow for more work to be compressed into a single phase, but would allow the regulatory agencies to percieve the complete investigation strategy being proposed by DOE.

We have included, at the conclusion of our comments, a list of nine items that are the minimum requirements that need to be addressed before the Division can recommend that this Workplan be approved.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman".

Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: Frazer Lockhart, DOE  
Tom Olsen, DOE  
Tom Ottesman, EG&G  
Tom Greengard, EG&G  
Barbara Barry, RFP  
Daniel S. Miller, AGO